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5
6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES OF AMERICA,

Case No. CR-05-70926 EMC

9 Plaintiff,

10 vs.

11 MEHERDAD NAMIRANIAN,

12 Defendant.
STIPULATION AND [PROPOSED]
ORDER TO PERMIT TRAVEL

13
14 **STIPULATION**

15 Defendant Meherdad Namiranian is on pretrial release in the above-captioned case with a
16 requirement that he obtain permission from the Court if he wishes to travel outside of the Northern
17 District of California. Mr. Namiranian has requested permission to travel to Houston, Texas and San
18 Antonio, Texas, departing from California on January 18, 2006, and returning to California on January
19 22, 2006. The purpose of the travel is to attend Mr. Namiranian's nephew's wedding on January 21,
20 2006.

21 On January 18, Mr. Namiranian will travel with his wife to Houston, TX, where he and his wife
22 will be picked up by his nephew, Kourosh Jahangir, and driven to San Antonio to stay at his nephew's
23 home. They will travel by car as a family from San Antonio to Houston on January 20, 2006, and the
24 wedding will take place in Houston on January 21, 2006. While in Houston, Mr. Namiranian and his
25 wife will stay at the home of Ms. Namiranian's cousin. Mr. Namiranian and his wife will return to the
26 Bay Area on January 22, 2005. United States Pretrial Services Officer Timothy Elder has approved this
27 travel, and we will provide Mr. Elder with Mr. Namiranian's complete travel itinerary and contact
28 information of the family members with whom Mr. Namiranian will be staying.

1 Good cause appearing therefor, and with the concurrence of Pretrial Services, Mr. Namiranian,
2 by and through his counsel, Edward W. Swanson, and the United States, by and through its attorney,
3 Assistant United States Attorney Robert Rees, HEREBY STIPULATE that Meherdad Namiranian may
4 travel to Houston, Texas and San Antonio, Texas between January 18 and January 22, 2006. All other
5 conditions of release shall remain unchanged.

6 IT IS SO STIPULATED.

7
8 Dated: January 10, 2006

/s/
Edward W. Swanson
Swanson & McNamara LLP
Attorney for Meherdad Namiranian

9
10
11 Dated: January 10, 2006

/s/
Robert Rees
Assistant United States Attorney

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13
14 Dated: January 10, 2006

/s/
Timothy Elder
United States Pretrial Services

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18 ORDER

19 Good cause appearing therefor, and upon the stipulation of the parties and United States Pretrial
20 Services Officer Timothy Elder, it is HEREBY ORDERED that Meherdad Namiranian may travel to
21 Houston, Texas and San Antonio, Texas between January 18 and January 22, 2006. All other
22 conditions of release shall remain unchanged.

23 IT IS SO ORDERED.

